

# **Exhibit 4**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

**Case No. 1:19-cv-08655 (LGS)(GWG)**

**DEFENDANT GOOGLE LLC'S  
OBJECTIONS AND RESPONSES TO  
PLAINTIFF'S FIRST SET OF  
INTERROGATORIES**

TO: **Outten & Golden LLP**  
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Pursuant to Rule 33 of the Federal Rules of Civil Procedure and Local Civil Rules 26.3 and 33.3 of the Southern District of New York, Defendant Google LLC ("Defendant" or "Google"), hereby provides the following objections and responses to Plaintiff Ulku Rowe's ("Plaintiff" or "Rowe") First Set of Interrogatories to Defendant Google LLC.

**DEFENDANT'S PRELIMINARY STATEMENT**

1. Defendant has not completed its investigation relating to this action, has not completed discovery in this action, and has not completed preparation for trial. As discovery proceeds, facts, information, evidence, documents and things may be discovered that are not set forth in these responses, but which may have been responsive to Plaintiff's Interrogatories. These responses are based on Defendant's knowledge, information, and belief at this time and are complete as to Defendant's best knowledge at this time. Defendant assumes no obligation to

voluntarily supplement or amend these responses to reflect information, evidence, documents, or things discovered following service of these responses. Furthermore, these responses were prepared based on Defendant's good faith interpretation and understanding of the individual Interrogatories and are subject to correction for inadvertent errors or omissions, if any. These responses are given without prejudice to subsequent revision or supplementation based upon any information, evidence, and documentation that hereinafter may be discovered. Defendant reserves the right to refer to, to conduct discovery with reference to, or to offer into evidence at the time of trial, any and all facts, evidence, documents, and things developed during the course of discovery and trial preparation, notwithstanding the reference to facts, evidence, documents, and things in these responses.

**DEFENDANT'S GENERAL OBJECTIONS TO PLAINTIFF'S FIRST  
SET OF INTERROGATORIES**

1. Defendant objects to the "Definitions" and "Instructions" set forth in Plaintiff's Interrogatories in their entirety, to the extent they purport to enlarge or alter Defendant's obligations under the Federal Rules of Civil Procedure, the Local Rules for the Southern District of New York, or any other applicable local rules, or to enlarge the scope of discovery permitted by said rules or other applicable law.

2. Defendant objects to Plaintiff's Instruction No. 8, which seeks to impose obligations upon Defendant beyond the requirements of applicable Federal and Local rules. Defendant will produce a privilege log in accordance with Federal Rule of Civil Procedure Rule 26 and Local Rule 26.2.

3. Defendant objects to Plaintiff's general definition of "External Complaint" as overly broad as to scope, and vague and ambiguous as to a "grievance" or "expression of concern."

4. Defendant objects to Plaintiff's general definition of "Internal Complaint" as overly broad as to scope, and vague and ambiguous as to a "grievance" or "expression of concern."

5. By producing information, identifications, or documents responsive to these Interrogatories, Defendant does not waive any argument concerning relevance, materiality or admissibility, whether at trial or for any other purpose.

6. Defendant objects to Plaintiff's Interrogatories in their entirety to the extent that they seek information, identifications, or documents that are not relevant to the subject matter of this litigation, are not proportional to the needs of this case or are not reasonably calculated to lead to the discovery of admissible evidence.

7. Defendant objects to Plaintiff's Interrogatories in their entirety to the extent that they call for information, identifications, or documents that are protected from disclosure by the attorney-client privilege and/or work product doctrine, and/or any other applicable privilege or immunity.

8. Defendant objects to Plaintiff's Interrogatories in their entirety to the extent that they are overly broad and require Defendant to make an unreasonable and unduly burdensome investigation.

9. Defendant objects to Plaintiff's Interrogatories in their entirety to the extent that they seek information, identifications, or documents, the disclosure of which would constitute an unwarranted invasion of the affected persons' constitutional, statutory, and/or common-law rights of privacy and confidentiality.

All General Objections are incorporated by reference into each Response as though set forth in full therein.

**DEFENDANT’S OBJECTIONS AND RESPONSES TO  
PLAINTIFF’S FIRST SET OF INTERROGATORIES**

**INTERROGATORY NO. 1:**

Identify all employees in Engineering and/or Industry Verticals at Level 9 or 10 within Google Cloud.

**OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 1:**

Defendant objects to this Interrogatory on the grounds that it is overly broad as to scope and seeks information that is not relevant to any party’s claim or defense, as Plaintiff has not alleged any facts to suggest that these individuals would be her proper comparators. Defendant further objects to this Interrogatory on the ground that it is vague and ambiguous as to “in Engineering” or “in . . . Industry Verticals.” Defendant further objects to this Interrogatory on the ground that it violates Local Civil Rule 33.3. Based on the foregoing objections, Defendant declines to respond to this Interrogatory.

**INTERROGATORY NO. 2:**

Identify all individuals involved in determining Plaintiff’s compensation (including base, incentive, and equity awards).

**OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 2:**

Defendant objects to this Interrogatory on the ground that it is vague and ambiguous as to “involved in determining” Plaintiff’s compensation. Defendant further objects to this Interrogatory to the extent that, though the incorporated Instructions, it seeks documents protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the following objections, and to the extent it understands this Interrogatory, Defendant responds by referring Plaintiff to the following documents:

GOOG-ROWE-00017322 - GOOG-ROWE-00017328

GOOG-ROWE-00017330 - GOOG-ROWE-00017339

GOOG-ROWE-00017341 - GOOG-ROWE-00017352

GOOG-ROWE-00017361 - GOOG-ROWE-00017361

GOOG-ROWE-00017362 - GOOG-ROWE-00017363

GOOG-ROWE-00017364 - GOOG-ROWE-00017366

GOOG-ROWE-00017367 - GOOG-ROWE-00017371

GOOG-ROWE-00017372 - GOOG-ROWE-00017374

GOOG-ROWE-00017375 - GOOG-ROWE-00017378

GOOG-ROWE-00017379 - GOOG-ROWE-00017381

GOOG-ROWE-00017382 - GOOG-ROWE-00017386

GOOG-ROWE-00017387 - GOOG-ROWE-00017392

GOOG-ROWE-00017592 - GOOG-ROWE-00017593

GOOG-ROWE-00017594 - GOOG-ROWE-00017595

GOOG-ROWE-00017998 - GOOG-ROWE-00018001

GOOG-ROWE-00019062 - GOOG-ROWE-00019062

GOOG-ROWE-00051963 - GOOG-ROWE-00051963

**INTERROGATORY NO. 3:**

Identify all individuals with knowledge of the selection process for the Vice President of Financial Services/Head of Financial Services role in Google Cloud.

**OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 3:**

Defendant objects to this Interrogatory on the ground that it is vague and ambiguous as to “knowledge of the selection process,” and as to “the Vice President of Financial Services/Head

of Financial Services role.” Defendant further objects to this Interrogatory to the extent it assumes that an individual was selected for the Financial Services Vertical Lead role. Defendant further objects to this Interrogatory to the extent that, though the incorporated Instructions, it seeks documents protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the following objections, and to the extent it understands this Interrogatory, Defendant responds by referring Plaintiff to the following documents:

GOOG-ROWE-00017410 - GOOG-ROWE-00017411

GOOG-ROWE-00017448 - GOOG-ROWE-00017448

GOOG-ROWE-00017450 - GOOG-ROWE-00017454

GOOG-ROWE-00017455 - GOOG-ROWE-00017458

GOOG-ROWE-00017459 - GOOG-ROWE-00017464

GOOG-ROWE-00017465 - GOOG-ROWE-00017469

GOOG-ROWE-00017470 - GOOG-ROWE-00017472

GOOG-ROWE-00017473 - GOOG-ROWE-00017477

GOOG-ROWE-00017478 - GOOG-ROWE-00017482

GOOG-ROWE-00017483 - GOOG-ROWE-00017487

GOOG-ROWE-00017488 - GOOG-ROWE-00017488

GOOG-ROWE-00017489 - GOOG-ROWE-00017489

GOOG-ROWE-00017490 - GOOG-ROWE-00017490

GOOG-ROWE-00017491 - GOOG-ROWE-00017491

GOOG-ROWE-00017492 - GOOG-ROWE-00017492

GOOG-ROWE-00017493 - GOOG-ROWE-00017493

GOOG-ROWE-00017494 - GOOG-ROWE-00017497

GOOG-ROWE-00017502 - GOOG-ROWE-00017504

GOOG-ROWE-00017505 - GOOG-ROWE-00017505

GOOG-ROWE-00017506 - GOOG-ROWE-00017506

GOOG-ROWE-00017507 - GOOG-ROWE-00017508

GOOG-ROWE-00017509 - GOOG-ROWE-00017514

GOOG-ROWE-00017515 - GOOG-ROWE-00017517

GOOG-ROWE-00017518 - GOOG-ROWE-00017519

GOOG-ROWE-00017520 - GOOG-ROWE-00017525

GOOG-ROWE-00017526 - GOOG-ROWE-00017531

GOOG-ROWE-00017532 - GOOG-ROWE-00017532

GOOG-ROWE-00017533 - GOOG-ROWE-00017538

GOOG-ROWE-00017539 - GOOG-ROWE-00017539

GOOG-ROWE-00017544 - GOOG-ROWE-00017553

GOOG-ROWE-00017565 - GOOG-ROWE-00017566

GOOG-ROWE-00017581 - GOOG-ROWE-00017581

GOOG-ROWE-00017583 - GOOG-ROWE-00017584

GOOG-ROWE-00017596 - GOOG-ROWE-00017597

GOOG-ROWE-00017598 - GOOG-ROWE-00017598

GOOG-ROWE-00017624 - GOOG-ROWE-00017632

GOOG-ROWE-00017634 - GOOG-ROWE-00017637

GOOG-ROWE-00017638 - GOOG-ROWE-00017638

GOOG-ROWE-00017639 - GOOG-ROWE-00017639

GOOG-ROWE-00017641 - GOOG-ROWE-00017641



GOOG-ROWE-00017643 - GOOG-ROWE-00017643

GOOG-ROWE-00017644 - GOOG-ROWE-00017645

GOOG-ROWE-00017648 - GOOG-ROWE-00017648

GOOG-ROWE-00017721 - GOOG-ROWE-00017721

GOOG-ROWE-00017722 - GOOG-ROWE-00017866

GOOG-ROWE-00017873 - GOOG-ROWE-00017875

**INTERROGATORY NO. 4:**

Identify all individuals with knowledge about Internal or External Complaints of gender discrimination, including complaints of pay and promotion discrimination and/or retaliation for complaints of discrimination, filed by any Google Cloud employee who worked in Defendant's U.S. offices against Google in the past five years.

**OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 4:**

Defendant objects to this Interrogatory on the ground that it is overly broad as to time and scope and seeks information not relevant to any party's claim or defense. Defendant further objects to this Interrogatory on the ground that it is unduly burdensome and is not proportional to the needs of the case. Defendant further objects based on the incorporated definition of "Internal Complaint" and "External Complaint." Defendant further objects to this Interrogatory on the grounds that, though the incorporated Instructions, it seeks documents protected by the attorney-client privilege and/or attorney work-product doctrine. Based on the foregoing objections, Defendant declines to respond to this Interrogatory.

**INTERROGATORY NO. 5:**

Identify all individuals who played any role in the investigation of Plaintiff's Internal Complaint and identify all documents generated in connection with Plaintiff's complaint.

**OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 5:**

Defendant objects to this Interrogatory on the grounds that it is overly broad as to scope and seeks information not relevant to any party's claim or defense, as it seeks identification of all individuals who "played any role" in the investigation of Plaintiff's complaint, and "all documents generated in connection with Plaintiff's complaint." This Interrogatory is therefore unduly burdensome and is not proportional to the needs of the case. Defendant further objects based on the incorporated definition of "Internal Complaint." Defendant further objects to this Interrogatory on the ground that it seeks information protected by the attorney-client privilege and/or attorney work-product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Interrogatory, Defendant responds that, for the purposes of providing legal advice, in-house counsel was involved in the Employee Relations investigation into Ms. Rowe's complaint stemming from her leveling at hire, and otherwise responds by referring Plaintiff to the following documents:

GOOG-ROWE-00017555 - GOOG-ROWE-00017557

GOOG-ROWE-00017558 - GOOG-ROWE-00017558

GOOG-ROWE-00017563 - GOOG-ROWE-00017564

GOOG-ROWE-00017573 - GOOG-ROWE-00017574

GOOG-ROWE-00017589 - GOOG-ROWE-00017591

GOOG-ROWE-00017599 - GOOG-ROWE-00017602

GOOG-ROWE-00017603 - GOOG-ROWE-00017606

GOOG-ROWE-00017607 - GOOG-ROWE-00017620

GOOG-ROWE-00017621 - GOOG-ROWE-00017622

GOOG-ROWE-00018007 - GOOG-ROWE-00018010

GOOG-ROWE-00018011 - GOOG-ROWE-00018013

**INTERROGATORY NO. 6:**

Identify all individuals, including expert witnesses, Defendant intends to call as witnesses at trial.

**OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 6:**

Defendant objects to this Interrogatory as it is premature; at this stage of litigation this Interrogatory is merely hypothetical as Defendant has not identified witnesses, including expert witnesses, for trial. Defendant further objects as the production of information sought by this Interrogatory is covered by the parties' Civil Case Management Plan and Scheduling Order in this case, and is and inconsistent with Federal Rule of Civil Procedure 26(a)(3)(B). Defendant further objects to this Interrogatory on the ground that it violates Local Civil Rule 33.3. Based on the foregoing objections, Defendant declines to respond to this Interrogatory.

**INTERROGATORY NO. 7:**


Identify each person in custody of any document consulted, referred to, or relied upon in (a) obtaining information for answers to these Interrogatories and/or Plaintiff's First Request for Production of Documents or (b) drafting Defendant's Answer.

**OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 7:**

Defendant objects to this Interrogatory on the ground that it is unduly burdensome and oppressive. Defendants further object to this Interrogatory on the ground that it seeks information protected by the attorney-client privilege and/or attorney work-product doctrine. Defendant further objects to this Interrogatory on the ground that it violates Local Civil Rule 33.3. Based on the foregoing objections, Defendant declines to respond to this Interrogatory.

Dated: New York, New York  
March 12, 2020

PAUL HASTINGS LLP

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 12, 2020, a true and correct a true and correct copy of the foregoing DEFENDANT GOOGLE LLC'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES was served by email on counsel for Plaintiff at the following email addresses:

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